

**REMARKS**

Reconsideration and allowance are respectfully requested.

Claims 1-19, 22, 24 and 35-37 remain pending in this application. No amendments to the claims have been made.

Claims 1-19, 22, 24 and 35-37 were rejected under 35 U.S.C. 103(a) as being unpatentable over Diwan in view of Peterson and Goodhand. Applicants respectfully traverse.

The Examiner has correctly conceded that Diwan fails to teach “a plurality of rule objects operable to apply rules to said content object to prepare the content in a first way for communication over a first one of the different channels and publication by a certain terminal connected to that first channel and prepare the content in a second way for communication over a second one of the different channels and publication by a certain terminal connected to that second channel.” To meet this limitation, the Examiner relies on Peterson. Applicants disagree that Peterson meets all the recited limitations.

In support of the rejection, the Examiner cites to Peterson col. 5, lines 10-18 and col. 11, lines 48-56. At these locations, Peterson teaches a procedure for constructing a custom or personal channel. To accomplish this goal, a user selects a set of channels (and content there from) of interest. The browser then operates to create a new channel for distribution to the user which contains the combined content from the selected set of channels (col. 11, lines 55-56). Thus, what is being taught by Peterson is the collection of information from multiple sources (channels) for aggregated distribution to a user over a single (new) delivery channel. This process as taught by Peterson, however, does not meet the recited claim limitations.

Applicants claim “a plurality of rule objects.” These rule objects operate on a “content object” for the purpose of preparing the content “in a first way” AND “in a second way.” The

content is prepared in the first way “for communication over a first one of the ... channels” for “publication by a certain terminal connected to that first channel.” The content is ALSO prepared in the second way “for communication over a second one of the ... channels” for “publication by a certain terminal connected to that second channel.” Thus, it will be noted that Applicants claim that the plurality of rule objects prepare the same content for distribution over two different channels. This is clearly contrasted with the Peterson operation where the browser prepares the content (as collected from plural sources) for distribution over a single channel (col. 11, lines 55-56). The cited portions of Peterson relied upon by the Examiner simply do not teach or suggest the use of rule objects (plural) operating for the purpose of preparing the same content in two ways for delivery over first and second channels.

Notably, Peterson appears to teach the same distribution concept as in Diwan. In Diwan, rules are applied to support bundle transmission based on Internet Protocol (IP) multicast routing techniques (see, col. 2, lines 41-52). Thus, while multiple networks are considered (col. 2, lines 59-65), Diwan publishes by preparing the content for communication in only a single way (i.e., the IP multicast way) with respect to all of those networks. There is no teaching for a first and second way preparation of the content for communication over corresponding different first and second communications channels.

Since neither Peterson nor Diwan teach the claimed “rule objects,” preparation of content in first and second ways, and communication of that prepared content over first and second different channels, Applicants respectfully submit that the Examiner has failed to make out the prima facie case. Withdrawal of the Section 103 rejection is accordingly requested.

It is further noted that Applicants claim that the rules used to prepare the same content for distribution by two different channels address not only the channels but also the connected terminals thereto which will publish the communicated content. As previously discussed, while

Diwan recognizes the existence of multiple devices or terminals (see, col. 2, line 66 to col. 3, line 3), Diwan does nothing with its rule operations when preparing the content to address publishing differences between those devices/terminals. Rather, it appears that Diwan instead relies on operations performed by those devices/terminals after receipt of the multicast communication to handle device-specific publication issues.

The cited portions of Peterson teach preparation of the content for distribution over a “new channel” (singular), and thus there is no action taken in Peterson for multiple different channels. Additionally, the cited portions of Peterson fail to address the issue of preparing the content with respect to the terminal connected to the “new channel” which will publish the communicated content. The issue of differences in devices/terminals with respect to publishing communicated content are not addressed by the portions of Peterson cited by the Examiner.

Since neither Peterson nor Diwan teach the claimed “rule objects” which prepare the content not only for communication over first and second different channels but also taking into account publishing issues of the terminals connected to those channels, Applicants respectfully submit that the Examiner has failed to make out the prima facie case. Withdrawal of the Section 103 rejection is accordingly requested.

For at least the foregoing reasons, Applicants respectfully submit that claims 1, 17 and 24 are patentable over the cited art of record.

Applicants further claim in claim 1 “at least one container object operable to receive said content object and template the prepared content to meet a certain publishing environment specified by a publisher of the content.” The Examiner correctly concedes that Diwan and Peterson fail to teach this limitation. To meet this limitation, the Examiner relies on Goodhand. Applicants disagree that Goodhand meets all the recited limitations.

In support of the rejection, the Examiner cites to Goodhand col. 26, line 62 to col. 27, line 7. At this location, Goodhand teaches applying a template or form for the purpose of displaying e-mail message fields. While Goodhand uses the term "template," that template appears to be defined through the MAPI environment with respect to the computer in which the e-mail is being displayed. Applicants are not simply claiming the generic concept of applying a template with respect to displaying information. Rather, the claim specifically recites that the publisher of the content (i.e., the content originator) specifies a certain publishing environment for its content and the claimed "container object" operates responsive to receipt of the generated content to then template (i.e., format) that content to meet the originator's specified certain publishing environment when it is published at the destination publishing terminal.

The claimed operations of the "container object" do not appear to be taught by Goodhand. While the claim is directed to publication templating the content in a originator's (publisher's) specified manner when sent for publication at the destination terminal, Goodhand teaches a different templating which is directed by a terminal and dictates how that same terminal displays information such as an e-mail communication. The templating in Goodhand is thus limited to acting at its own terminal. It does not in any way template the manner of publishing an e-mail at another terminal (for example the destination terminal of an e-mail communication). Instead, Goodhand suggests that each terminal involved in the e-mail communication can have its own template or format for e-mail display. In no case does the cited portion of Goodhand suggest that the originator of an e-mail specify the destination terminal's display or publication template. The claimed invention, however, specifically indicates, with respect to the prepared content which is to be communicated, that the container object perform just that function of templating the prepared content (which is then communicated) in a way

such that when received after communication it meets the publication environment specified by the content publisher (i.e., the originator).

Since neither Peterson, Diwan nor Goodhand teach the claimed “container object” which prepares the content to be communicated to meet a content publisher specified publishing environment, Applicants respectfully submit that the Examiner has failed to make out the prima facie case. Withdrawal of the Section 103 rejection of claim 1 is accordingly requested.

For at least the foregoing reasons, Applicants respectfully submit that claims 1, 18 and 35 are additionally patentable over the cited art of record.

In dependent claims 19 and 36, Applicants claim that a first one of the distribution channels is a newspaper print publication channel and the second one of the distribution channels comprises an electronic publication channel such as email, broadcast, ethernet, wireless ethernet, cellular, video and the Internet. The Examiner cites to Diwan at col. 2, lines 54-65 and col. 4, lines 5-16 as meeting the claimed limitations. Applicants respectfully disagree.

At col. 2, lines 54-65, Diwan discloses a number of publication channels of the electronic variety. A similar identification of electronic-type publication channels is made by Diwan at col. 4, lines 5-16. Claims 19 and 36, however, claim more than just “electronic publication channels such as email, broadcast, ethernet, wireless ethernet, cellular, video and the Internet.” What is important to note is that claims 19 and 36 ADDITIONALLY recite that one of the two different channels comprise an electronic publication channel while the other channel must be “a newspaper print publication channel.” There is no teaching or suggestion in Diwan with respect to “a newspaper print publication channel.” Even more specifically, as noted above, and conceded by the Examiner, Diwan wholly fails to teach the claimed rule objects which operate to prepare content in first/second ways for communication over first/second channels, and furthermore Diwan fails to teach that any channel could comprise a newspaper print publication

channel. Applicants respectfully submit that the Examiner has failed to make out the prima facie case. Withdrawal of the Section 103 rejection of claims 19 and 36 is accordingly requested.

In view of the foregoing, Applicants submit that the pending claims are patentable over the art as cited by the Examiner. Applicants accordingly submit that the pending application is in condition for allowance.

Dated: 2/27/06

Respectfully submitted,

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